

December 1, 2017

VIA ELECTRONIC FILING

Josh Minges, Hearing Examiner
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Re: Shorthorn Solar, LLC, et al. v. Duke Energy Carolinas, LLC and Duke Energy
Progress, LLC
Docket No. 2017-281-E

Dear Josh:

On behalf of Duke Energy Progress, LLC and Duke Energy Carolinas, LLC, I am writing to provide an update on discovery issues since our meeting on November 15th. At that meeting our motion to compel was held in abeyance to give the parties an opportunity to resolve issues relating to our discovery requests to the Complainants. It was agreed at the meeting that the first step in attempting to find a resolution was that Complainants would make a proposal for what information they were willing to provide and how they would propose to limit their responses to our requests.

Since November 15th we have received no communication from the Complainants to resolve the discovery issues framed in our motion to compel: we have not received one answer to an interrogatory; we have not received one document in response to our requests for documents; and we have not received any proposal from Complainants on what they think are reasonable limitations on our discovery requests.



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Under the circumstances we ask that you proceed to issue an order requiring Complainants to fully respond to our discovery as requested in our pending motion to compel.

Yours truly,

Frank R. Ellerbe, III

FRE:tch

cc: Richard Whitt, Esquire (via email)
Andrew M. Bateman, Counsel (via email)
Benjamin L. Snowden, Esquire (via email)
Heather Shirley Smith, Deputy General Counsel (via email)
Rebecca J. Dulin, Senior Counsel (via email)